

NOTED FOR:

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re:

JOHN DOE,

Debtor.

Case No. \_\_\_\_\_

Chapter \_\_\_\_\_

REGINA ROE, Trustee,

Plaintiff,

vs.

ELWOOD TOE,

Defendant.

Adversary No. \_\_\_\_\_

**DEFENDANT'S STATEMENT OF  
ISSUES OF MATERIALS FACT**

**[EXAMPLE]**

Defendant Elwood Toe submits the following responses to  
Plaintiff's Statement of Uncontroverted Facts:

There are genuine issues of material fact regarding:

**I.**

**PREFERENCE:**

(00-0000 - Plf's Name vs. Deft's Name)

Defendant's Statement of Issues of Material Fact - 1 of 3

PLAINTIFF'S STATEMENT OF FACT

C. Debtor was solvent.

D.

The transfer was in the  
ordinary course of business.

Etc. . . .

DEFENDANT'S RESPONSE

C. Dep. Of [Bank Officer], taken  
\_\_\_\_\_ [ or Doc. No.  
\_\_\_\_\_ ] at page 12, line 20  
through page 26, line 5;

Declaration of [Expert], at  
pp. 44-45 and exhibits 2 and  
3 (reconstructed balance  
sheets)

D.

IV.

FRAUDULENT TRANSFER:

PLAINTIFF'S STATEMENT OF FACT

A.

B.

C.

DEFENDANT'S RESPONSE

A.

B.

C.

(00-0000 - Plf's Name vs. Deft's Name)

Defendant's Statement of Issues of Material Fact - 2 of 3

PLAINTIFF'S STATEMENT OF FACT

DEFENDANT'S RESPONSE

D.

D.

Etc:

DATED:     \_\_\_                 200\_\_.

By

\_\_\_\_\_  
Attorney for Defendant  
Elwood Toe

(00-0000 - Plf's Name vs. Deft's Name)

Defendant's Statement of Issues of Material Fact   - 3 of 3